

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

VICTOR WESTBROOK,

Plaintiff,

v.

LAZ PARKING/GEORGIA LLC,

Defendant.

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Case No. 3:22cv975

DEFENDANT’S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW Defendant LAZ Parking/Georgia LLC (“LAZ”), and pursuant to Local Rule 6.01, requests an enlargement of time up to and including January 16, 2023, within which to answer Plaintiff’s Complaint. In support of this Motion, LAZ states as follows:

1. The Federal Rules of Civil Procedure grant this Court significant discretion in enlarging the time permitted to file an answer or other responsive pleading to a complaint. Specifically, Rule 6(b)(1)(A) provides in part that when “an act may or must be done within a specified time, the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A).

2. The time by which LAZ must respond to the Complaint has not expired and will not expire sooner than the end of the day of January 9, 2023.

3. LAZ needs additional time to sufficiently respond to Plaintiff’s Complaint; the holiday season complicated the timely completion of this investigation.

4. The undersigned conferred with Plaintiff’s Counsel about the subject matter of this Motion via email on January 5, 2023. Plaintiff’s Counsel advised that the Plaintiff does not oppose this Motion.

5. This extension will not alter any other deadlines in this matter.

WHEREFORE, LAZ requests that its Unopposed Motion for Enlargement of Time be granted and that the time by which it must serve an answer the Complaint be enlarged to January 16, 2023.

Submitted this 6th day of January, 2023.

Respectfully submitted:

/s/ Jennifer S. Rusie
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, the foregoing *Unopposed Motion for Extension of Time* was served via the Court's ECF system upon the following:

Ann Buntin Steiner
Steiner & Steiner, LLC

Jesse Ford Harbison
Jesse Harbison Law, PLLC

/s/ Jennifer S. Rusie
Jennifer R. Rusie